

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

\_\_\_\_\_  
INA STEINER, DAVID STEINER, and  
STEINER ASSOCIATES, LLC,

Plaintiffs,

v.

EBAY INC., et al.,

Defendants.  
\_\_\_\_\_

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) Civil Action No. 21-CV-11181-PBS  
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**JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER**

Plaintiffs Ina Steiner, David Steiner, and Steiner Associates, LLC and Defendants eBay Inc. (“eBay”), Progressive F.O.R.C.E. Concepts, LLC (“PFC”), Devin Wenig, Steve Wymer, Jim Baugh, David Harville, Brian Gilbert, Philip Cooke, Stephanie Popp, Stephanie Stockwell, Veronica Zea, Wendy Jones, and Steve Krystek (the “Parties”) file this Joint Motion for Entry of Protective Order (the “Motion”). In support of this Motion, the Parties state as follows:

1. On September 28, 2023, the Court issued an order directing the Parties to submit a protective order by October 16, 2023. *See* Dkt. No. 271.
2. On October 16, 2023, the Parties submitted a joint motion to request a two day extension, up to and including October 18, 2023, to file a protective order. *See* Dkt. 272.
3. The Parties have conferred and reached agreement on a joint protective order, attached here as Exhibit A.

WHEREFORE, the Parties respectfully request that the Court enter the Parties’ proposed protective order, attached hereto as Exhibit A.

Dated: October 18, 2023

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 18, 2023, this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants. An email copy was sent to pro se defendant Stephanie Stockwell.

Dated: October 18, 2023

/s/ Jack W. Pirozzolo

Jack W. Pirozzolo